

Remark/Arguments

A. Claims in the Case

Claims 1-113 have been rejected. Claims 1, 2, 13, 14, 24, 43, 44, 54, 55, 64, 81, 82, 88, 89 and 95 have been amended. Claims 29-42, 69-80, and 100-110 have been canceled without prejudice. Claims 1-28, 43-68, 81-99, and 111-113 are pending in the case.

B. The Claims Are Not Obvious Over Ryan in View of Brooks in Further View of Borghesi Under 35 U.S.C. § 103(a)

The Examiner has rejected claims 1-113 as being obvious over U.S. Patent Application No. 5,655,085 to Ryan et al. (hereinafter, "Ryan") in view of U.S. Patent Application No. 4,992,972 to Brooks et al. (hereinafter "Brooks") in further view of U.S. Patent Application No. 5,950,169 to Borghesi et al. (hereinafter "Borghesi") under 35 U.S.C. § 103(a). Applicant respectfully disagrees with these rejections.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981 (CCPA 1974), MPEP § 2143.03.

Applicant respectfully disagrees that claim 1 and the claims dependent therefrom are obvious in light of the teachings of Ryan, Brooks, and Borghesi.

Amended claim 1 describes a combination of features including, but not limited to:

initiating a first step in the processing of the insurance claim;

automatically reading a page identifier for the display page for the first step from display information describing the display page for the first step in response to initiating the first step;
automatically locating a first help information entry for the first step in a help database using the page identifier for the display page, wherein the first help information entry for the first step includes a first unit of help information for the first step in response to initiating the first step;
automatically reading the first unit of help information for the first step from the first help information entry in the help database in response to initiating the first step;
automatically displaying the first unit of help information read from the first help information entry for the first step on the display in response to initiating the first step; and
automatically displaying the display page for the first step on the display in response to initiating the first step.

Support for the amendments to claim 1 may be found, for example, on page 5 of Applicant's specification which states:

The insurance claims processing system may enter a processing step and display a page for the processing step. In one embodiment, the context-sensitive help for the step may be automatically invoked when entering the step.
(Specification, Page 5, lines 1-3)

Applicant submits that the combination of Ryan, Brooks, and Borghesi does not appear to teach or suggest all of the features of Applicant's claim 1.

Ryan appears to disclose a method of providing a help system when selected by the user. For example, Ryan states:

Additionally, the user may select Help, Block 260, which has been previously mentioned as being available from any screen in the system from the Update Existing Illustration Supermenu. A representative context-sensitive hypertext Help screen is shown in User Screen 13.

Applicant submits that Ryan appears to teach that a context-sensitive help system is available upon request (i.e., when the user selects help). Ryan does not appear to teach or suggest the automatic display of help information, or suggest the need for the automatic display of help information.

The Office Action appears to rely on Brooks for the specifics of the help system. Applicant, submits, however, that Brooks does not appear to teach a method of automatically displaying help information in response to initiating an insurance claim processing task. Brooks, instead, appears to teach that help functions are initiated only upon request by the user. For example, Brooks states:

If the user wishes help, he presses the keyboard "Help" key at 204. If at that time the cursor is located in the input field 202 of one of the parameters, then the task panel 200 is overlaid on the display screen with a help-text panel 210 containing text 211 describing the parameter whose field the cursor 203 is located in. If cursor 203 is not in any of the input fields of panel, then pressing Help key 205 brings up a help-text panel 220 which describes the command generally in text lines 221. In either case, additional panels can be displayed by using the keyboard scroll keys, such as "Page Down" at 222. In the case of the general help panel 220, the panels for all specific parameters such as 210 may be scrolled as though they were part of the general panel 220. Scrolling can be backward as well as forward, as indicated by the "Page Up" key at 212. When the user is finished with the help facility, he presses an "Exit" function key as at 223 to return task panel 200 to the display. (This key is actually the "F3" programmable-function key on the keyboard.) This is known as "context-sensitive" help, since the help panel presented to the display varies, depending upon the what the user is about to do--that is, depending upon the context of the task.

(Brooks, col. 3, line 65 - col. 4, line 20)

Initially, application program reaches call/return 401, and calls for the presentation on display 420 of a command panel according to a particular definition 411, as portrayed by arrow 402. Entries 413-415 format the panel and send it to the display, arrow 412. The user may move the display cursor 421. If the cursor is within a defined help area 417, as indicated by the dotted box 422, the user may request context-sensitive help for the command associated with that area by pressing Help key 431 at arrow 423. Arrow 432 then indicates searching the help-area file until an entry 417 contains a LOCATION specification which includes the screen location of cursor 421. Arrow 418 accesses the help module 441 having the NAME contained in entry 417, and presents

its first panel to display 420 at arrow 442. As described earlier, the user may then scroll through any additional panels, and may return to the command panel by pressing the Exit key.
(Brooks, col. 7, lines 42-59)

Applicant submit that Brooks does not appear to teach or suggest at least the features of:

- automatically reading a page identifier for the display page for the first step from display information describing the display page for the first step in response to initiating the first step;
- automatically locating a first help information entry for the first step in a help database using the page identifier for the display page, wherein the first help information entry for the first step includes a first unit of help information for the first step in response to initiating the first step;
- automatically reading the first unit of help information for the first step from the first help information entry in the help database in response to initiating the first step;
- automatically displaying the first unit of help information read from the first help information entry for the first step on the display in response to initiating the first step; and
- automatically displaying the display page for the first step on the display in response to initiating the first step.

Additionally, Applicant submits that neither Ryan nor Brooks teaches or suggests a need for automatically generating help display panels. Applicant further submits that Borghesi does not appear to teach or suggest the use of a help system. As such, Applicant submits that the combination of Ryan, Brooks and Borghesi does not appear to teach or suggest all of the features of claim 1.

Amended claim 13 describes a combination of features including, but not limited to:

- initiating a first step in the processing of the bodily injury insurance claim;
- automatically retrieving a page identifier for the display page for the first step from display information describing the display page for the first step in response to initiating the first step;
- automatically locating a first page identifier entry for the page identifier in a first index table, wherein the first page identifier entry includes a first object identifier for

locating help information entries in one or more help information tables in response to initiating the first step;
automatically reading the first object identifier from the first page identifier entry in response to initiating the first step;
automatically locating a first help information entry for the first object identifier in a first help information table from the one or more help information tables, wherein the first help information entry for the first object identifier includes a first unit of help information for the first step in response to initiating the first step;
automatically reading the first unit of help information for the first step from the first help information entry in the first help information table in response to initiating the first step;
automatically displaying the first unit of help information read from the first help information entry for the first step on the display in response to initiating the first step; and
automatically displaying the display page for the first step on the display in response to initiating the first step.

Applicant submits that amended claim 13 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

Amended claim 24 describes a combination of features including, but not limited to:

initiating a first step in the processing of the bodily injury insurance claim;
automatically retrieving a page identifier for a display page for the first step from display information describing the display page for the first step in response to initiating the first step;
automatically locating a plurality of page identifier entries for the page identifier in one or more index tables, wherein each of the plurality of page identifier entries includes an object identifier for locating object identifier entries for the page identifier in one or more help information tables in response to initiating the first step;
automatically retrieving a plurality of object identifiers from the plurality of page identifier entries in response to initiating the first step;
automatically locating a first plurality of help information entries for the plurality of object identifiers in the one or more help information tables, wherein each of the first plurality of help information entries includes a unit of help information for the display page for the first step in response to initiating the first step;

automatically reading a first plurality of units of help information for the display page for the first step from the first plurality of help information entries in response to initiating the first step;
automatically displaying the first plurality of units of help information read from the first plurality of help information entries for the display page for the first step on the display in response to initiating the first step; and
automatically displaying the display page for the first step on the display in response to initiating the first step.

Applicant submits that amended claim 24 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

Amended claim 43 describes a combination of features including, but not limited to:

initiate a first step in the processing of the bodily injury insurance claim;
automatically locate a first help information entry for the first step in the help database using a page identifier for the first step, wherein the first help information entry for the first step includes a first unit of help information for the first step in response to initiating the first step;
automatically read the first unit of help information for the first step from the first help information entry in the help database in response to initiating the first step;
automatically display the first unit of help information read from the first help information entry for the first step on the display device in response to initiating the first step; and
automatically display the display page for the first step on the display device in response to initiating the first step.

Applicant submits that amended claim 43 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

Amended claim 54 describes a combination of features including, but not limited to:

initiate a first step in the processing of the bodily injury insurance claim;

automatically retrieve a page identifier for a display page for the first step from display page information for the first step in response to initiating the first step;

automatically locate a first page identifier entry for the page identifier in a first index table, wherein the first page identifier entry includes a first object identifier for locating help information entries in the one or more help information tables in response to initiating the first step;

automatically read the first object identifier from the first page identifier entry in response to initiating the first step;

automatically locate a first help information entry for the first object identifier in a first help information table from the one or more help information tables, wherein the first help information entry for the first object identifier includes a first unit of help information for the first step in response to initiating the first step;

automatically read the first unit of help information for the first step from the first help information entry in the first help information table in response to initiating the first step;

automatically display the first unit of help information read from the first help information entry for the first step on the display device in response to initiating the first step; and

automatically display the display page for the first step on the display device in response to initiating the first step.

Applicant submits that amended claim 54 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

Amended claim 64 describes a combination of features including, but not limited to:

initiate a first step in the processing of the bodily injury insurance claim;

automatically retrieve a page identifier for a display page for the first step from display page information for the first step in response to initiating the first step;

automatically locate a plurality of page identifier entries for the page identifier in one or more index tables, wherein each of the plurality of page identifier entries includes an object identifier for locating object identifier entries for the page identifier in one or more help information tables in response to initiating the first step;

automatically retrieve a plurality of object identifiers from the plurality of page identifier entries in response to initiating the first step;

automatically locate a first plurality of help information entries for the plurality of object identifiers in the one or more help information tables, wherein each of the first plurality of help information entries includes a unit of help information for the display page for the first step in response to initiating the first step;
automatically read a first plurality of units of help information for the display page for the first step from the first plurality of help information entries in response to initiating the first step;
automatically display the first plurality of units of help information read from the first plurality of help information entries for the display page for the first step on the display device in response to initiating the first step; and
automatically display the display page for the first step on the display device in response to initiating the first step.

Applicant submits that amended claim 64 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

Amended claim 81 describes a combination of features including, but not limited to:

initiating a first step in the processing of the bodily injury insurance claim;
automatically reading a page identifier for the display page for the first step from display information describing the display page for the first step in response to initiating the first step;
automatically locating a first help information entry for the first step in a help database using the page identifier for the display page, wherein the first help information entry for the first step includes a first unit of help information for the first step in response to initiating the first step;
automatically reading the first unit of help information for the first step from the first help information entry in the help database in response to initiating the first step;
automatically displaying the first unit of help information read from the first help information entry for the first step on the display in response to initiating the first step; and
automatically displaying the display page for the first step on the display in response to initiating the first step.

Applicant submits that amended claim 81 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

Amended claim 88 describes a combination of features including, but not limited to:

initiating a first step in the processing of the bodily injury insurance claim;
automatically retrieving a page identifier for the display page for the first step from display information describing the display page for the first step in response to initiating the first step;
automatically locating a first page identifier entry for the page identifier in a first index table, wherein the first page identifier entry includes a first object identifier for locating help information entries in one or more help information tables in response to initiating the first step;
automatically reading the first object identifier from the first page identifier entry in response to initiating the first step;
automatically locating a first help information entry for the first object identifier in a first help information table from the one or more help information tables, wherein the first help information entry for the first object identifier includes a first unit of help information for the first step in response to initiating the first step;
automatically reading the first unit of help information for the first step from the first help information entry in the first help information table in response to initiating the first step;
automatically displaying the first unit of help information read from the first help information entry for the first step on the display in response to initiating the first step; and
automatically displaying the display page for the first step on the display in response to initiating the first step.

Applicant submits that amended claim 88 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

Amended claim 95 describes a combination of features including, but not limited to:

initiating a first step in the processing of the bodily injury insurance claim;
automatically retrieving a page identifier for a display page for the first step from display information describing the display page for the first step in response to initiating the first step;
automatically locating a plurality of page identifier entries for the page identifier in one or more index tables, wherein each of the plurality of page identifier entries

includes an object identifier for locating object identifier entries for the page identifier in one or more help information tables in response to initiating the first step;
automatically retrieving a plurality of object identifiers from the plurality of page identifier entries in response to initiating the first step;
automatically locating a first plurality of help information entries for the plurality of object identifiers in the one or more help information tables, wherein each of the first plurality of help information entries includes a unit of help information for the display page for the first step in response to initiating the first step;
automatically reading a first plurality of units of help information for the display page for the first step from the first plurality of help information entries in response to initiating the first step;
automatically displaying the first plurality of units of help information read from the first plurality of help information entries for the display page for the first step on the display in response to initiating the first step; and
automatically displaying the display page for the first step on the display in response to initiating the first step.

Applicant submits that amended claim 95 is patentable over the combination of Ryan, Brooks, and Borghesi for at least the reasons cited above.

C. Many Of The Dependent Claims Are Separately Patentable

The Examiner is also respectfully requested to separately consider each of the dependent claims for patentability. Many of the dependent claims in addition to those mentioned above are independently patentable.

For instance, claims 111, 112, and 113 recite in part “wherein the first unit of help information and the display page for the first step are displayed on the display at the same time.” Applicant submits that this feature, in combination with the features of the independent claims, does not appear to be taught or suggested by the cited art.

With respect to this feature, the Office Action states “Although Ryan and Brooks do not explicitly state the first unit of help information and the display page of the first step being

displayed at the same time, it is respectfully submitted that typical help systems present both the help system and the current application a user is working in simultaneously...” Applicant submits that portions of the aforementioned rejection appears to be set forth in facts within the personal knowledge of the Examiner and therefore Applicant believes MPEP 2144.03 will apply. Pursuant to MPEP 2144.03, Applicant respectfully requests the Examiner to provide support for his assertion either by an affidavit or by references brought to the Applicant’s attention. Otherwise, Applicants request this rejection be removed. *See, e.g.*, MPEP 2143.01

Additionally, Applicant respectfully submits that the Office Action refers to “typical help systems” however the Office Action does not mention when such a typical help system was publicly known. Applicant respectfully reminds the Examiner that the combination of references must be considered at the time “when the invention was unknown and just before it was made” *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988), quoting *Panduit Corp. v. Dennison Mfg. Co.*, 810 F.2d 1561, 1566, 1 USPQ2d 1593, 1595-1596 (Fed. Cir. 1987).

D. Summary

Based on the above, Applicant submits that all of the claims are in condition for allowance. Favorable reconsideration is respectfully solicited.

Applicant respectfully requests a one-month extension of time to respond to the Office Action dated March 4, 2004. A fee authorization form in the amount of \$110.00 is enclosed for the extension of time fee. If any further extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any additional fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel Deposit Account No. 50-1505/5053-35700/EBM.

Respectfully submitted,



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